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Food Safety And Inspection Service
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AUDIT REPORT FOR FRANCE

MAY 7 THROUGH MAY 23, 2001

INTRODUCTION

Background

This report reflects information that was obtained during the annual audit of France's meat and poultry inspection system from May 7 through May 23, 2001. Eight of the twenty-seven establishments that were eligible to export meat and poultry products to the United States (U.S.) were audited. Four of the eight establishments audited on-site were slaughter establishments and four were processing operations.

The last audit of France's meat and poultry inspection system was conducted from October 16 through November 8, 2000. Eleven of the twenty-nine establishments were then eligible to export meat and poultry products to the United States were audited. Eight establishments were acceptable; three (24-396-01, 29-027-01 and 29-225-01) were evaluated as acceptable/re-review. The principal concerns with system at that time were the following:

1. In Ests. 29-225-01 and 29-027-01, the floor, overhead structures and conveyor belts were in need of repair and replacement. In these establishments, corrective actions were not being taken for contamination of product-contact surfaces, and the frequency and time of pre-operational and operational sanitation checks were not recorded in the Sanitation Standard Operating Procedures (SSOP). Heavy rail grease was observed at several places on the overhead structures and on the rails in the cooler in Est. 29-027-01. Cobwebs and broken ceilings were observed in dry storage area in Est. 29-225-01.
2. In Est. 24-396-01, condensation on the overhead structures and cracked floors was observed.
3. In Est. 87-085-02, daily operational sanitation checks were not being conducted, records were not being maintained, and SSOP document was not signed and dated.

The auditor verified on-site that all of the deficiencies from the last audit were corrected. The French authorities stated that documentation of all corrective measures taken was available for review at the departmental offices.

At the time of this audit, France was eligible to export fresh, processed and canned poultry products and canned pork products to the United States. At this time, France is not eligible to export beef and fresh products due to Bovine Spongiform Encephalopathy (BSE) and Foot and Mouth Disease (FMD).

From January to April 2001, France exported 163,550 pounds of canned pork, canned varied combination, processed varied combination products, poultry product specialty items, ready-to-cook geese, and cured pork products to the United States. One hundred seventy seven (177) pounds of product were rejected at port-of-entry for unsound condition.

PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with the French national meat and poultry inspection officials to discuss oversight programs and practices, including enforcement activities. The second entailed an audit of a selection of records from ten establishments at the French meat inspection headquarters. The third part was conducted by on-site visits to eight establishments. The fourth was a visit to the Laboratoire National Veterinaire de Rungis, a central laboratory at Rungis, which cultures field samples for the presence of microbiological contamination with *Salmonella* and *Escherichia coli (E. coli).*

Frances's program effectiveness was assessed by evaluating five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOPs), (2) animal disease controls, (3) residue controls, (4) slaughter/ processing controls, including the implementation and operation of Hazard Analysis and Critical Control Point (HACCP) systems and the generic *E. coli* testing program, and (5) enforcement controls, including the testing program for *Salmonella* species.

In accordance with the European Union/United States Veterinary equivalence Agreement, the auditors audited France's meat and poultry inspection system using European Directives, specifically Council Directives 96/23EC of April 29, 1996, 96/22/EC of April 29, 1996, and 64/433/EC of June 1964. These three directives have been declared equivalent under the Agreement. In areas not covered by these directives, the auditors audited against FSIS requirements and equivalence determinations. France has been granted two equivalence determinations. These determinations concerned the use of a different analytical method for analyzing *Salmonella* samples and tightened enforcement by the government of France for performance standard failures.

During all on-site establishment visits, the auditor evaluated the nature, extent, and degree to which findings impacted on food safety and public health, as well as overall program delivery. The auditor also determined if establishment and inspection system controls were in place. Establishments that do not have effective controls in place to prevent, detect, and eliminate product contamination/adulteration are considered unacceptable and therefore ineligible to export products to the U.S., and are delisted accordingly by the country's inspection officials.

RESULTS AND DISCUSSION

Summary

Effective inspection system controls were found to be in place in all eight of the establishments audited; two of these (29-097-01 and 40-088-03) were recommended for re-review. Details of audit findings, including compliance with HACCP, SSOPs, and testing programs for *Salmonella* and generic *E. coli*, are discussed later in this report.

As stated above, the major concerns identified during the last audit of the French meat and poultry inspection system had been addressed and corrected.

Entrance Meeting

On May 7, 2001, an entrance meeting was held with French government officials in Paris. The French participants included Dr. Paul Mennecier, Chief International Unit; Dr. Thibault Lemaitre, Veterinary Officer, Mr.Christian Bastien, Bureau of establishment transformation of MAF-DGALG; and Dr. Jorgen Alveen, Veterinary Inspector, Food and Veterinary Office, European Commission, Health and Consumer Protection Directorate General (EC-HCPDG), Dublin and Dr. Maryse Flamme, Veterinary Inspector, National Interprofeessional Agency for Meat, Livestock and Poultry, Paris, France (OOFIVAL).

The U.S. participant was Dr. Suresh Singh, International Audit Staff Officer; United States Department of Agriculture (USDA), Food Safety and Inspection Service (FSIS), Technical Service Center, Omaha, Nebraska.

Topics of discussion included the following:

- Welcome by French officials and explanation of the U.S. audit to E.U Officials.
- Overview of the French National Meat Inspection Program and Itinerary for this audit.
- Organization of HACCP coordination team.
- Discussion of the previous audit report.

Headquarters Audit

There had been no changes in the organizational structure or upper levels of inspection staffing since the last U.S. audit of the French inspection system in October 2000, except for the retirement of Dr. Bernard Vallat, Chief Veterinary Officer of MAF-DGAL of France and the appointment of Dr. Isabelle Chmitelin to the position and appointment of Dr. Paul Mennecier as Head of the International Sanitary Coordination Unit who was Agriculture Counselor at Washington. The Director General of DGAL is Catherine Geslain-Laneelle. In addition, the GOF has recently created an inspection coordination unit at the central and regional levels to oversee and enforce U.S. requirements for HACCP, SSOP, generic *E. coli* and *Salmonella* testing programs.

To gain an accurate overview of the effectiveness of inspection controls, FSIS requested that the veterinary inspection officials who normally conduct monthly supervisory reviews and/or audits for compliance with US import requirements lead the audits of the individual establishments. The FSIS auditor (hereinafter called “the auditor”) observed and evaluated the process.

The auditor conducted a review of inspection system documents pertaining to the following establishments: 02-502-01, 22-093-01, 32-147-23, 35-188-01, 40-282-02, 47-157-043, 53-097-01, 67-447-05, 85-109-01, and 85-065-01. The records review was conducted at France's inspection headquarters and at a regional office. The records review focused primarily on food safety hazards and included the following:

- Supervisory visits to establishments that were certified to export to the U.S.
- New laws and implementation documents, such as laws, regulations, notices, directives and policy guidelines.
- Pathogen reduction and other food safety initiatives such as SSOP, HACCP programs, generic *E. coli* testing and *Salmonella* testing
- Control of products from livestock with conditions such as tuberculosis and cysticercosis, and of inedible and condemned materials.
- Export product inspection and control including export certificates
- Enforcement records including examples of criminal prosecution, consumer complaints, recalls, and seizures; control of noncompliant product; and withholding, suspending, or withdrawing inspection from certified establishments that export to the U.S.

No concerns arose as a result of examination of these documents except few discrepancies in SSOP and HACCP documents which are mentioned in Attachments A and B.

Government Oversight:

All inspection service veterinarians and inspectors in establishments certified by France as eligible to export meat products to the United States were full-time Veterinary Inspection employees of MAF-DGAL, receiving no remuneration from either industry or establishment.

Recently, central and regional coordinators have been appointed within GOF-DGAL to coordinate and correlate HACCP and microbiological testing and other food inspection activities in all exporting meat and poultry establishments.

There is no daily coverage of inspection in processing establishments. In U.S. certified establishments, government inspectors do not visit processing establishments on daily basis.

Establishment Audits:

Eight out of 27 establishments certified to export meat and poultry to the US were audited on site (19-031-02, 29-027-01, 29-097-01, 29-225-01, 40-088-03, 40-143-50, 56-091-01, and 67-482-21); six were acceptable and two establishments (29-097-01 and 40-088-03) were judged acceptable subject to re-review. These two establishments immediately corrected the observed deficiencies, however, other variations were observed during the current audit and these variations are mentioned later in this report. In all eight establishments visited, both

French inspection system controls and establishment system controls were in place to prevent, detect and control contamination and adulteration of products.

Details of audit findings and observations, including compliance with HACCP, SSOP, and testing programs for *Salmonella* and generic *E. coli* are discussed later in this report.

Laboratory Audits

During the laboratory audits, emphasis was placed on the application of procedures and standards that were equivalent to U.S. requirements. Information was also collected about the risk areas of government oversight of accredited, approved, and private laboratories, intra-laboratory quality assurance procedures, including sampling handling and methodology.

The Laboratoire Departmental Veterinaire in Quimper was audited on May 18, 2001. Effective controls were in place for sample handling and frequency, timely analysis, data reporting, tissue matrices for analysis, equipment operation and printouts, minimum detection levels, recovery frequencies, percent recoveries, and corrective actions. The methods used for the analyses were acceptable. No composting of samples was done.

France's microbiological testing program for *Salmonella* and generic *E. coli* was being performed in the government laboratory at the Laboratoire Regional of Veterinaire (Departmental Veterinary Laboratory), MAF-DGAL. Dr. Eric Laporte is the Director of this laboratory.

Establishment Operations by Establishment Number

The following operations were being conducted in the eight establishments:

Swine slaughter, cutting, and boning—three establishments (29-225-01, 29-097-21, and 56-091-01)
Ducks and geese, boning and canning—three establishments (19-031-02, and 40-088-03, 67-482-21)
Pork, chicken, duck and goose, boning, cutting, grinding, smoking, cooking and canning-one establishments (29-027-01).
Duck slaughter —one establishment (40-143-50).

SANITATION CONTROLS

Based on the on-site audits of establishments, France's inspection system had controls in place for basic establishment facilities, condition of facilities, product protection and handling and establishment sanitation programs except the concerns of cross-contamination noted below.

Sanitation Standard Operating Procedures (SSOPs)

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment A).

The SSOPs were found to meet the basic FSIS regulatory requirements with the following variations:

Cross-Contamination

Cross contamination of head of carcasses from dressing floor and workers boot was observed in one of the establishment (29-097-011 audited. The Government of France and establishment officials took corrective actions.

Product Handling and Storage: In the area of product handling and storage, the following deficiency was found.

In Est. 29-097-21, products that accidentally contaminated on the floor were not properly reconditioned and there was not a designated area to carry out reconditioning procedures.

Personal Hygiene and Practices: In the area of personal hygiene and practices, in all establishments, employees were observed to follow good personal hygiene and practices.

ANIMAL DISEASE CONTROLS

France's inspection system had controls in place to ensure adequate animal identification, ante-mortem and post-mortem inspection procedures and dispositions, condemned and restricted product control and procedures for sanitary handling of returned and rework product.

Since the previous U.S. audit, there have been reports of outbreaks of Foot and Mouth Disease and of Bovine Spongiform Encephalopathy (BSE) in cattle, with significant public health significance. French and EU officials are taking several precautions and adopting procedures and programs to control both outbreaks. The U.S. does not import any beef products from France.

RESIDUE CONTROLS

There was in-depth team audit of the residue program during last review. The national residue plan for 2001 was being followed and was on schedule. The French inspection system had adequate controls in place to ensure compliance with sampling and reporting procedures and storage and use of chemicals.

SLAUGHTER/PROCESSING CONTROLS

Except as noted below, the French inspection system had controls in place to ensure adequate animal identification; ante-mortem inspection procedures; ante-mortem disposition; humane slaughter; post-mortem inspection procedures; post-mortem dispositions; condemned product control; restricted product control; ingredients identification; control of restricted ingredients; formulations; processing schedules; equipment and records; and processing controls of cured, dried, and cooked products.

HACCP Implementation

All establishments approved to export meat and poultry products to the U.S. are required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment B).

The HACCP programs were found to meet the basic FSIS regulatory requirements with the following exceptions:

1. In one establishment (56-091-01), the frequency of monitoring of critical control points (CCPs) was not specified and adequate documentation for recording CCPs was not performed.

2. In one establishment (29-097-01), pre-shipment review of HACCP records was not being conducted.

Testing for Generic *E. coli*

France has adopted the FSIS regulatory requirements for generic *E. coli* testing.

Five of the establishments audited were required to meet the basic FSIS regulatory requirements foe generic *E. coli* testing, and were audited and evaluated according to the criteria employed in the U.S. domestic program. The data collection instruments used accompanies this report (Attachment C).

The *E. coli* testing programs were found to meet the basic regulatory requirements.

Additionally, establishments had adequate controls in place to prevent meat and poultry products intended for French domestic consumption from being commingled with products eligible for export to the U.S.

ENFORCEMENT CONTROLS

Inspection System Controls

Except as noted below, the French meat and poultry inspection system had controls in place for ante- and post-mortem inspection procedures and dispositions, restricted product and inspection samples, disposition of dead, dying, diseased or disabled animals, shipment security, including shipment between establishments, and prevention of commingling of product intended for export to the U.S. with domestic product.

Also, monitoring and verification of establishment programs and controls (including the taking and documentation of corrective actions under HACCP plans) were in place and effective in ensuring that products produced by the establishments were wholesome unadulterated, and properly labeled.

In addition, controls are in place for inspection supervision and documentation, the importation of only eligible livestock or poultry from other countries, i.e., only from eligible third countries and certified establishments within those countries, and the importation of only eligible meat or poultry products from other counties for further processing. These controls were in place and effective in ensuring that products produced by the establishments were wholesome, unadulterated, and properly labeled. Adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

Boneless meat re-inspection and associated record keeping was not carried out in those establishments where boneless meat re-inspection was required (processing establishments).

Testing for *Salmonella* Species:

Five of the establishments audited were required to meet the basic FSIS regulatory requirements for *Salmonella* testing, and were evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment D).

France has adopted the FSIS regulatory requirements for *Salmonella* testing with the exception of the following equivalent measures:

1. The Government of France uses ISO 6579 to analyze samples for *Salmonella.*
2. France suspends an establishment from export to the U.S. the first time the establishment fails to meet a performance standard.

Species Verification Testing:

At the time of this audit, France was not exempt from the species verification-testing requirement. The auditor verified that species verification testing was being conducted in accordance with FSIS requirements.

Listeria monocytogenes Testing

Establishments must implement a *Listeria monocytogenes-testing* program for ready-to-eat products. France has implemented a separate, national *Listeria monocytogenes* testing program and the program is operating in accordance with U.S. requirements.

Monthly Reviews

FSIS requires that monthly supervisory visits be performed in certified French establishments. However, the Government of France was not performing monthly supervisory visits in establishments certified to export to the U.S. The Prefecture (Regional) Director's office of MAF performs in-depth reviews of certified establishments once or twice a year. Local veterinarians of MAF were conducting reviews based on the time available and the discretion of supervisory inspection officials. DGAL inspectors review all processing establishment as needed for export and for other activities.

The internal review program was not applied equally to both export and non-export establishments. The records of audited establishments were kept in the inspection offices of the individual establishment and in the Prefecture (regional) MAF offices.

In the event that an establishment is found, during one of these internal reviews, to be out of compliance with U.S. requirements, and is delisted for U.S. export, before it may again qualify for eligibility, the deficiencies must be satisfactorily corrected and acceptable to the National Inspection Supervisor.

Enforcement Activities

Enforcement activities are carried out by MAF-DGAL, which has full power to initiate all enforcement actions.

Exit Meeting

Exit meeting was conducted in Paris on May 23, 2001. This was a videoconference with European Union (EU) and was arranged by MAF-DGAL and was held at the office in the main building of Ministry Of Agriculture and Food (MAF). This meeting was held to discuss the findings of the audit.

The exit meeting was attended by Dr. Paul Mennecier, Head of the International Sanitary Coordination Unit, Dr. Thibault Lemaitre, chief Bureau of Transformation; Mr.Christian Bastien of MAF. Dr. Thomas Golden; and Dr. Jorgen Alveen, Veterinary Officers, European Union, Dublin and Brussels (on TV Video); and Dr. Maryse Flamme, Meat Board (OFIVAL-MAE) of France.

The U.S. participant was Dr. Suresh Singh, International Audit Staff Officer, Technical Service Center, FSIS, USDA, Omaha, Nebraska.

The following topics were discussed:

- Findings and conclusions of the audit.

- Findings noted with HACCP pre-shipment verification and SSOP record keeping for pre-operational and operational sanitation.

- Lack of monthly reviews of certified establishments and inadequate establishment and inspection service verification of establishments' HACCP records.

CONCLUSION

The French meat and poultry inspection system was found to have effective controls in place to ensure that product destined for export to the U.S. was produced under conditions equivalent with requirements of FSIS as in U.S. domestic establishments. Eight establishments were audited; six were acceptable and two were acceptable subject to re-review. The deficiencies encountered during the on-site establishment audits were adequately addressed to the auditor's satisfaction.

Dr. Suresh P. Singh *(signed) Dr. Suresh P. Singh*
International Audit Staff Officer

ATTACHMENTS

A. Data collection instrument for SSOP
B. Data collection instrument for HACCP programs
C. Data collection instrument for generic *E. coli* testing
D. Data collection instrument for *Salmonella* testing
E. Laboratory Audit Forms
F. Individual Foreign Establishment Audit Forms
G. Written foreign country's response to draft final audit report

Attachment A

Data Collection Instrument for SSOP

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOP were met, according to the criteria employed in the US domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written SSOP program.
2. The procedure addresses pre-operational sanitation.
3. The procedure addresses operational sanitation.
4. The pre-operational procedures address (at a minimum) the cleaning of food-contact surfaces of facilities, equipment, and utensils.
5. The procedure indicates the frequency of the tasks.
6. The procedure identifies the person responsible for implementing and maintaining the activities.
7. The records of these procedures and any corrective action taken are being maintained on a daily basis.
8. The procedure is dated and signed by the person with overall on-site authority.

The results of these evaluations were as follows:

Est. #	1. Written SSOP	2. Pre-op sanitation	3. Operation sanitation	4. Food Contact	5. Task frequency	6. Person resp	7. Daily Records	8. Dated and signed
1903102	√	√	√	√	√	√	√	√
2902701	√	√	√	√	√	√	√	√
2909701	√	√	No	√	√	√	√	√
2922501	√	√	√	√	√	√	√	√
4008803	√	√	No	√	√	√	No	√
4014350	√	√	√	√	√	√	√	√
5609101	√	√	No	√	√	√	√	√
6748221	√	√	√	√	√	√	√	√

Internal compliance of audit documentation of SSOP and records for establishments 0250201, 2209301, 3214723, 3518801, 4028218801, 47157043, 5309701, 6744705, 8506501, and 8510901 were audited and met all FSIS requirements, except in establishment 53-097-01 where SSOP was included in the HACCP plan and operational sanitation was not addressed and documented in establishments 3214723 and 47157043. The establishment and French Veterinary officials agreed to correct these deficiencies as required by Pathogen Reduction regulations (CFR-9-Parts-416 and 417).

Attachment B

Data Collection Instrument for HACCP Programs

Each of the establishments approved to export meat products to the US is required to have developed and implemented a Hazard Analysis and Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the US domestic inspection program. The data collection instrument included the following statements:

1. The establishment has a flow chart that describes the process steps and product flow.
2. The establishment had conducted a hazard analysis that includes food safety hazards likely to occur.
3. The analysis includes the intended use of or the consumers of the finished product(s).
4. There is a written HACCP plan for each product where the hazard analysis revealed one or more food safety hazard(s) reasonably likely to occur.
5. All hazards identified in the analysis are included in the HACCP plan; the plan lists a CCP for each food safety hazard identified.
6. The HACCP plan specifies critical limits, monitoring procedures, and the monitoring frequency performed for each CCP.
7. The plan describes corrective actions taken when a critical limit is exceeded.
8. The HACCP plan was validated using multiple monitoring results.
9. The HACCP plan lists the establishment's procedures to verify that the plan is being effectively implemented and functioning and the frequency for these procedures.
10. The HACCP plan's record-keeping system documents the monitoring of CCPs and/or includes records with actual values and observations.
11. The HACCP plan is dated and signed by a responsible establishment official.
12. The establishment is performing routine pre-shipment document reviews.

The results of these evaluations were as follows:

Est.	1. Flow diagram	1. Hazard and analysis conducted	3.use &users included	4.Plan for each hazards	5.CCPs for all hazards.	6.Monitoring is specified.	7.Correction are described.	8.Plan validated.	9.Adequate verification procedures.	10.Adequate documentation.	11.Date and Signed.	12.Pre-shipment document review.
1903102	√	√	√	√	√	√	√	√	√	√	√	√
2902701	√	√	√	√	√	√	√	√	√	√	√	√
2909701	√	√	√	√	√	√	No	√	√	√	√	no
2922501	√	√	√	√	√	√	√	√	√	√	√	√
4008803	√	√	√	√	√	√	√	√	√	√	√	√

4014350	√	√	√	√	√	√	√	√	√	√	√	√
5609101	√	√	√	√	√	No	√	√	√	√	√	√
6748221	√	√	√	√	√	√	√	√	√	√	√	√

Internal compliance of audit documentation of HACCP and records for establishments 0250201, 2209301, 3214723, 3518801, 4028218801, 47157043, 5309701, 6744705, 8506501, and 8510901 were audited and met all FSIS requirements, except in establishment 2909721 where corrective actions were not recorded in the monitoring of a CCP. Pre-shipment review was not documented in few establishments (3214723 and 47157043. The establishment and French Veterinary officials agreed to correct these deficiencies as required by Pathogen Reduction regulations (CFR-9-Parts-416 and 417).

Attachment C

Data Collection Instrument for Generic *E. coli* Testing

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for generic *E. coli* testing were met, according to the criteria employed in the US domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written procedure for testing for generic *E. coli.*
2. The procedure designates the employee(s) responsible to collect the samples.
3. The procedure designates the establishment location for sample collecting.
4. The sample collection is done on the predominant species being slaughtered.
5. The sampling is done at the frequency specified in the procedure.
6. The equivalent carcass site and collection methodology (Swab) is being used for sampling.
7. The carcass selection is following the random method specified in the procedure or is being taken randomly.
8. The laboratory is analyzing the sample using an AOAC Official Method or an equivalent method.
9. The results of the tests are being recorded on a process control chart but on a table form showing the most recent test results.
10. The test results are being maintained for at least 12 months.

Est. #	1.Written procedure	2. Sampler designated	3.Sampling location given	4. Predomin. Species sampled	5. Sampling at the req'd freq.	6. Proper site or method	7. Sampling is random	8. Using AOAC method	9. Chart or graph of results	10. Results are kept at least 1 yr
2902 721	√	√	√	√	√	√	√	√	√	√
2909 721	√	√	√	√	√	√	√	√	√	√
5609 101	√	√	√	√	√	√	√	√	√	√
4014 350	√	√	√	√	√	√	√	√	√	√
2922 501	√	√	√	√	√	√	√	√	√	√

Internal compliance of audit documentation of E.coli testing and results and records for establishments 2209301, 3518801, 5309701, and 8510901 were audited and met all FSIS requirements.

Attachment D

Data Collection Instrument for *Salmonella* Testing

Each slaughter establishment was evaluated to determine if the basic FSIS regulatory requirements for *Salmonella* testing were met, according to the criteria employed in the US domestic inspection program. The data collection instrument included the following statements:

1. *Salmonella* testing is being done in this establishment.
2. Carcasses are being sampled.
3. Ground product is being sampled.
4. The samples are being taken randomly.
5. The equivalent carcass site and method is being used for sampling.
6. Establishments in violation are not being allowed to continue operations.

The results of these evaluations were as follows:

Est. #	1. Testing as required	2. Carcasses sampled	3. Ground product is sampled	4. Samples are taken randomly	5. Proper site and/or proper product	6. Violative est's stop operations
2922501	√	√	N/A	√	√	√
2902701	√	√	√	√	√	√
5609101	√	√	N/A	√	√	√
4014350	√	√	N/A	√	√	√
2909721	√	√	N/A	√	√	√

Documentation was also audited from establishments 2209301 3518801 and 5309701 that were not visited on-site. All audited records from these establishments met the FSIS requirements.